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February 15, 2018

BY ECF

Honorable Stuart M. Bernstein  
United States Bankruptcy Court  
for the Southern District of New York  
One Bowling Green  
New York, NY 10004

Re: *Securities Investor Protection Corporation v. Bernard L.  
Madoff Investment Securities LLC*, No. 08-1789 (SMB)

Dear Judge Bernstein:

We represent defendants Royal Bank of Canada, Guernroy Limited, and RBC Alternative Assets, L.P. in *Picard v. Royal Bank of Canada*, Adv. Pro. No. 12-1699, and RBC Dexia Investor Services Trust in *Picard v. Banque Internationale a Luxembourg S.A.*, Adv. Pro. No. 12-1698 (collectively, the “RBC Defendants”). As requested by the Court during oral argument on February 8, 2018, I am submitting the attached chart comparing the Trustee’s proposed document requests at issue in this motion<sup>1</sup>, with the document requests the Trustee previously included in the Rule 2004 subpoena dated July 28, 2009 which the Trustee served on Royal Bank of Canada (the “RBC Rule 2004 Subpoena”).<sup>2</sup> The chart also includes a column categorizing the Trustee’s Proposed Document Requests as well as additional columns demonstrating how the requested information in each category tracks the related requests in the RBC Rule 2004 Subpoena.

We will, of course, provide any other information the Court otherwise requests.

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<sup>1</sup> Those document requests are attached as Exhibit B to the August 28, 2014 Declaration of Howard L. Simon, Adv. Pro. No. 08-1789, ECF No. 7833-3 (the “Trustee’s Proposed Document Requests”).

<sup>2</sup> The RBC Rule 2004 Subpoena is attached as Exhibit A to the Declaration of Anthony L. Paccione in Opposition to the Trustee’s Motion for Discovery on the Good Faith Issue, Adv. Pro. No. 08-1789, ECF No. 16728-1.

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Respectfully,

/s/ Anthony L. Paccione  
Anthony L. Paccione

Attachment

cc: Counsel of Record